

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of the Petition of the)	
Washington Utilities and Transportation)	NSD File No. L-99-102
Commission for Delegated)	DA 00-155
Authority to Implement Number)	CC Docket 96-98
Conservation Measures)	

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FEDERAL COMMUNICATIONS COMMISSION
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COMMENTS OF GTE

Dated: February 28, 2000

GTE Service Corporation and its affiliated
domestic telephone operating and wireless
companies

Thomas R. Parker
GTE Service Corporation
600 Hidden Ridge, HQE03J27
P.O. Box 152092
Irving, TX 75015-2092
(972) 718-6361

Andre J. Lachance
GTE Service Corporation
1850 M Street, N.W.
Washington, DC 20036
(202) 463-5276

Their Attorneys

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COMMENTS OF GTE

GTE Service Corporation and its affiliated domestic telephone operating and wireless companies¹ (collectively "GTE") respectfully submit these comments to the Federal Communications Commission ("FCC" or "Commission") in response to the petition for authority to implement various number conservation measures filed by the Washington Utilities and Transportation Commission ("WUTC").²

¹ GTE's affiliated domestic telephone operating and wireless companies are: GTE Alaska Incorporated, GTE Arkansas Incorporated, GTE California, Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., Contel of the South, Inc., GTE Wireless Incorporated, and GTE Communications Corporation.

² Petition to Federal Communications Commission for Expedited Decision for Delegation of Authority to Implement Number Conservation Measures, filed by the Washington Utilities and Transportation Commission, December 10, 1999 ("Petition").

I. BACKGROUND

In September, 1998, the FCC adopted an order resolving a petition for a declaratory ruling filed by the Pennsylvania Public Utility Commission.³ There, the Commission delegated additional authority to the states, in narrow circumstances, to order NXX code rationing plans, but affirmed that states have no authority to order return of NXX codes or 1,000 number blocks to the code administrator.⁴ In addition, in an effort to work cooperatively with the states to conduct number conservation or number pooling trials, the Commission encouraged state commissions to seek additional delegated authority to implement proposed number conservation methods.⁵ In particular, the Commission stated it was “interested in working with state commissions that have additional ideas for innovative number conservation methods that this Commission has not addressed.”⁶

The *Pennsylvania Numbering Order* spawned a slew of requests for additional delegated authority. In September, 1999, the Commission granted additional interim

³ Petition for Declaratory Ruling and Request for Expedited Action of the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610 215, and 717, NSD File No. L-97-42, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, *Memorandum Opinion and Order and Order on Reconsideration*, 13 FCC Rcd 19009 (1998) (“*Pennsylvania Numbering Order*”).

⁴ *Id.*, at 19025-19027.

⁵ *Id.*, at 19030-19031 (¶ 31). The FCC encouraged the states to first submit their proposals to the North American Numbering Council (“NANC”). The Commission stated it would seek a recommendation from NANC prior to ruling on such requests.

⁶ *Id.*, at 19030 (¶ 31).

numbering authority to New York, Florida, Massachusetts, California and Maine.⁷

Subsequently, in November, 1999, the Commission granted similar authority to Texas, Connecticut, Wisconsin, Ohio, and New Hampshire.⁸

The WUTC petition asks the Commission for authority to implement the following measures:

1. Enforce number assignment standards; including auditing the use of numbering resources, and reclaiming unused and reserved area codes;

⁷ New York Dep't. of Public Service Petition for Additional Delegated Authority to Implement Number Conservation Measures, *Order*, CC Docket No. 96-98, FCC 99-247, NSD File No. L-99-21 (rel. Sept. 15, 1999); Florida PSC Petition to FCC for Expedited Decision for Grant of Authority to Implement Number Conservation Measures, *Order*, CC Docket No. 96-98, FCC 99-249, NSD File No. L-99-33 (rel. Sept. 15, 1999); Massachusetts Dep't. of Telecommunications and Energy Petition for Waiver of Section 52.19 to Implement Various Area Code Conservation Methods, *Order*, CC Docket No. 96-98, FCC 99-246, NSD File No. L-99-19 (rel. Sept. 15, 1999); California PUC Petition for Delegation of Additional Authority Pertaining to Area Code Relief and NXX Code Conservation Measures, *Order*, CC Docket No. 96-98, FCC 99-248, NSD File No. L-98-136 (rel. Sept. 15, 1999); Maine PUC Petition for Additional Delegated Authority to Implement Number Conservation Measures, *Order*, CC Docket No. 96-98, FCC 99-260 (rel. Sept. 28, 1999).

⁸ Texas PUC Petition for Expedited Decision for Authority to Implement Number Conservation Measures, *Order*, CC Docket No. 96-98, FCC 99-2636, NSD File No. L-99-55 (rel. Nov. 30, 1999); Wisconsin PSC Petition for Delegation of Additional Authority to Implement Number Conservation Measures, *Order*, CC Docket No. 96-98, FCC 99-2637, NSD File No. L-99-64 (rel. Nov. 30, 1999); Ohio PUC Petition for Delegation of Additional Authority to Implement Number Conservation Measures, *Order*, CC Docket No. 96-98, FCC 99-2635, NSD File No. L-99-74 (rel. Nov. 30, 1999); New Hampshire PUC Petition for Additional Delegated Authority to Implement Number Optimization Measures, *Order*, CC Docket No. 96-98, FCC 99-2634, NSD File No. L-99-71 (rel. Nov. 30, 1999); Connecticut Dep't. of Public Utility Control Petition for Delegation of Additional Authority to Implement Area Code Conservation Measures, *Order*, CC Docket No. 96-98, FCC 99-263, NSD File No. L-99-62 (rel. Nov. 30, 1999).

2. Implement mandatory thousands-block number pooling trials using existing Thousand Number-Block Pooling (TNP) software (Number Pooling Administration Center (NPAC) release 1.4) until the later editions (release 3.0) are available;
3. Adopt interim number-assignment standards;
4. Implement interim unassigned number porting; and
5. Revise rationing procedures if necessary.

II. DISCUSSION

A. Additional number pooling trials are unnecessary.

GTE recommends that the WUTC request be declined for the following reasons:

1. The Commission has authorized a sufficient number of pooling trials to fully evaluate the merits of the number conservation methodologies currently being considered by industry participants. Adequate information should be provided by the pooling trials underway in the states that have previously been granted interim authority.
2. The telecommunications industry is anticipating a numbering order from the Commission in the near future, perhaps as soon as March 2000. Additional state trials at this time could be counterproductive to a smooth transition to a standard national numbering solution.
3. Additional state pooling trials with release 1.4 diminish the amount of industry resources available to fully test and deploy NeuStar's release 3.0 software which will support an efficient 1000 block number pooling environment anticipated from the FCC.
4. The WUTC petition does not propose to test new innovative numbering approaches. Thus, the WUTC petition fails to meet an important criteria for additional authority established in the *Pennsylvania Numbering Order*.

B. Implementation of additional state number pooling trials will place undue burdens on national carriers.

The Commission must not continue to permit states to make their own determinations on number administration practices. Allowing states to mandate state-specific interim solutions could delay the adoption and implementation of national standards which the Commission will adopt in the very near future. Implementation of state-specific requirements are onerous to national carriers such as GTE. At present, GTE operates as a wireline carrier in 28 states and offers wireless services in 17 states. The need to track and maintain separate requirements by state greatly increases the complexity of deployment (and its associated cost), creates the potential for operational problems in centralized systems, and increases the likelihood of errors. National carriers lose economies of scale for vendor engineering developments because vendors are forced to develop multiple solutions based on state requirements. The added strain on limited company resources has the real potential to delay deployment of the standard national numbering solution.

C. GTE is concerned with every aspect of the WUTC petition.

GTE's specific concerns and positions relative to each measure the WUTC seeks authority to implement are set forth below.

1. Enforce number assignment standards, including auditing the use of numbering resources, and reclaiming unused and reserved area codes

GTE objects to state specific number assignment standards. GTE supports establishing national number assignment standards which include provisions for auditing use of numbering resources and reclaiming unused and reserved NXX codes.

2. Implement mandatory thousand-block number pooling with NPAC release 1.4 software

GTE supports the national implementation of thousand-block number pooling (TNP) among wireline carriers in areas where the benefits of pooling exceed the associated costs. The challenge is to determine which factors/criteria can be used to make an accurate determination. TNP is most beneficial when implemented concurrently with the introduction of an area code relief plan.

GTE opposes mandatory implementation of number pooling in Washington with NPAC release 1.4 software. This version lacks the necessary system and process enhancements found in NPAC release 3.0 that will make TNP an automated, scalable, and robust solution in conformance with a national architecture. According to the January 18, 2000 Central Office Code Utilization Study (COCUS) report, the earliest projected number exhaust date for the areas codes referenced in the WUTC filing is second quarter, 2002. The North American Numbering Council (NANC) Number Pooling Subcommittee is projecting that NPAC release 3.0 will begin commercial deployment in fourth quarter, 2000. Based on this timetable, GTE strongly recommends that no further pooling authority be granted which would use the NPAC release 1.4 software.

3. Implement interim number assignment standards

GTE supports establishing national standards which define competitively neutral criteria for acquiring numbering resources. GTE recommends that all users of numbering resources supply forecast and utilization data to the NANPA and that the WUTC should only obtain aggregated data from the NANPA to assist in code relief

activities. Without such data it would be impossible to accurately predict when NPA exhaust will occur. Further, by providing the data to NANPA which would in turn provide the data in aggregate form to state commissions, carriers could be certain that their competitively sensitive information would be protected.

4. Unassigned number porting (UNP)

The Commission is mindful of the problems related to unassigned number porting that could create difficulty in routing and disruption of calls to E911. The industry is currently studying UNP to determine if the concept is justifiable, implementable and useful as a number conservation tool. No industry standard process has been defined for UNP.

5. Revised rationing procedures

By allowing the WUTC to establish its own rationing guidelines without industry consensus, the WUTC could set the rationing level so low that the life of an area code could be extended for years. The current approach that specifies industry consensus provides a good check and balance for the rationing process and this guideline should be perpetuated until national standards are established.

III. CONCLUSION

The WUTC Petition should be denied. Granting the WUTC Petition would be counterproductive to the ultimate Commission objective of deploying a standard national numbering policy and could delay accomplishment of that ultimate objective. Rather than authorize further state specific solutions, the WUTC and other state commissions should work with the Commission to hasten the release of a uniform numbering optimization policy as quickly as possible.

Dated: February 28, 2000

Respectfully submitted,

GTE Service Corporation and its affiliated
domestic telephone operating and wireless
companies

Thomas R. Parker
GTE Service Corporation
600 Hidden Ridge, HQE03J27
P.O. Box 152092
Irving, TX 75015-2092
(972) 718-6361

By


Andre J. Lachance
GTE Service Corporation
1850 M Street, N.W.
Washington, DC 20036
(202) 463-5276

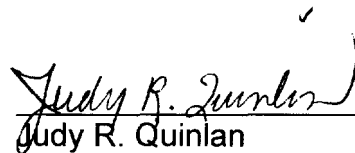
Their Attorneys

CERTIFICATE OF SERVICE

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Comments of GTE" have been sent by first class United States mail, postage prepaid, on February 28, 2000 to the parties listed below:

Richard Hemstad
Washington Utilities and Transportation Commission
1400 S. Evergreen Park Drive, SW
Olympia, WA 98504

David E. Screven
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105



Judy R. Quinlan